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2 May 2014

Mr. John Nordine
U.S. EPA Region 5
RCRA Enforcement and Compliance Assurance Branch (LU-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois Revised Monthly Progress Report for August 2013

Dear Mr. Nordine:

Enclosed please find the revised Monthly Progress Report for the Central Wire facility located in Union, Illinois for the month of August 2013. This has been revised based on U.S.EPA's comments in your letter dated April 15, 2014.

The Electronic Discharge Monitoring Report (eDMR) for the groundwater pump and treat facility for August 2013 and the groundwater elevation data for monitoring well DGW-2I are also included in this report.

If you have any comments or questions regarding the progress of this project, please do not hesitate to call me at (262) 237-1130.

Sincerely,
Autumnwood ESH Consultants, LLC

John W. Thorsen, P.E.

JWT:jt

encl

cc:	Joyce Munie	IEPA
	Robert Kay	USGS
	Gerald W. Ruopp	Central Wire
	Henry Lopes	Central Wire
	Robert Johnson	Central Wire

MONTHLY PROGRESS REPORT
Central Wire Union, Illinois Site
August 2013

1. **Progress Made This Reporting Period** – This reporting period Central Wire continued the operation and maintenance of the groundwater extraction and treatment system. Central Wire treated an average of 463,000 gallons per day (GPD) with a maximum day at 642,000 GPD and met effluent limitations for pH; 1,1,1-Trichloroethane (TCA); Trichloroethene (TCE) and Tetrachloroethene (PCE). The effluent sample was collected on August 28, 2013.

The reason for the lower average GPD over the month was that the pump for Well 1 burned out on August 19. Central Wire is waiting for a replacement to be built. That should arrive at Central Wire on September 13.

The electronic Discharge Monitoring Report (eDMR) for August 2014 is attached to this report. This is still being misreported on the eDMR as 1,1,1-Trichloroethane, Trichloroethane and Tetrachloroethane, respectively. Since Central Wire cannot change this, a permit modification was requested of IEPA to correct the permit on December 5, 2013 back to the original permit which set permit limitations and reporting requirements on 1,1,1-Trichloroethane, Trichloroethene and Tetrachloroethene.

The groundwater level monitoring data from downgradient monitoring well DGW-2I is currently being collected for 2013. Over the course of the month the water table went down 0.980 ft. from the high point which occurred early in the month to the low occurring at the end of the month.

Ex. 6 Personal Privacy (PP) utilized the Ex. 6 Personal Privacy (PP) well for 104 hours and the Ex. 6 Personal Privacy (PP) well for 245 hours in August 2013 as shown in the table below

Summary of August 2013 Irrigation at Ex. 6 Personal Privacy (PP)

Date of Hour Meter Reading	Ex. 6 Personal Privacy (PP)			
	Hour Meter Reading	Hours Pumped	Hour Meter Reading	Hours Pumped
7/29/2013	4880	0	2831	0
8/6/2013	4880	0	2842	11
8/12/2013	4926	46	2860	18
8/20/2013	5025	99	2894	34
8/27/2013	5097	72	2920	26
9/3/2013	5125	28	2935	15
Totals		245		104

The groundwater elevation recorded data for monitoring well DGW-2I is in a file attached to this report. It provides the groundwater elevations reported in feet above mean sea level and the precipitation that occurred on that day. At the bottom of that file is a graph

showing the changes in groundwater elevations over the month and precipitation by day and a separate graph of groundwater elevation vs. hours of irrigation pumping per week. EPA has requested that Central remove the hours from the x-axis (8/19/2013 0:00), but that is inclusive in the plotting of the graph utilizing the Excel graphing software and cannot be removed.

EPA has also suggested/requested that the precipitation information for Marengo be omitted or included specifically for the monitoring dates of August 6 to September 3. NOAA does no longer supports the web page that was used into extract that information in September 2013 so it is not available for Central Wire to provide this information to EPA.

Summary of Validated Data and Results – On June 10 & 11 the semiannual Resource Conservation and Recovery Act (RCRA) groundwater well and residential well sampling event took place. Graphs of the trends of chlorinated solvents in those well that exceed or have exceeded the EPA Maximum Contaminant Levels (MCLs) are attached to this report along with a figure that shows the locations of all of the wells.

MW-2 has had samples under the MCLs for 12 sampling events in a row over six years. MW-4 has exceeded the MCLs for TCE, PCE, 1,1-Dichloroethane (DCA) and total 1,2-Dichloroethene (DCE) in the past. MW-4 exceeded all four MCLs in June of 2009, but since then has only exceeded the TCE and PCE MCLs and in December 2012 and June 2013 only exceeded the PCE MCL.

MW-5 has, in the past, exceeded MCLs for TCA, TCE, PCE and DCE, but in the last 17 sampling events over 8.5 years has only exceeded the PCE MCL and that value has declined from 190 ug/L in January 2005 to 86 ug/L in June 2013. MW-5D has exceeded MCLs for TCE and PCE. However, in the past 14 sampling events over seven years has only exceeded the TCE MCL and it has declined from 47.5 ug/L in December 2005 to 18 ug/L in June 2013.

MW-6 only exceeds the PCE MCL and it has declined from 9.9 in December 2005 to under the MCL at 4.9 ug/L in June 2013. For MW-7 TCE, PCE and DCE MCLs have been exceeded. The DCE MCL has not been exceeded since June 2003 and in June 2013, only the PCE MCL was exceeded. PCE has declined from a high of 200 ug/L in December 2006 to 46 ug/l in June 2013.

The MCL for TCE and PCE have been exceeded at MW-8. They have come down from highs of 34 ug/L for TCE and 200 ug/l for PCE to 5.5 and 66 ug/L, respectively. The only MCL exceeded at MW-9 was PCE and that was 22 sampling events ago or April of 2002. The only MCL exceeded at MW-HBR is PCE. It has declined from a high of 130 ug/L in December 2003 to 50 ug/l in June 2013.

The only other wells that exceeded the MCLs were DGW-1I and DGW-1D. DGW-1I has exceeded MCLs for DCE, TCA, TCE, DCA and PCE. The last time the DCA and PCE MCLs were exceeded was June 2005 and April 2002, respectively. DCE has gone from

6 ug/L in February 1998 up to 120 ug/L in June 2012 and was down to 54 ug/L in June 2013. Likewise TCA has gone from 0 ug/L in February 1998 to 710 ug/L in June of 2012 and was down to 260 ug/L in June 2013. Lastly, TCE has gone from 4 ug/L in February 1998 to 110 ug/L in December 2009 and back down to 9 ug/L in June 2013.

For those volatile organic compounds that have exceeded the MCLs in monitoring well DGW-1D, 1,1 DCE has risen from 4 ug/L in 1998 to 98 in December 2005, was down to less than 10 in June 2009 and June 2010 and has varied going up to 43 ug/L in June 2011 and down to 2.6 ug/L in June 2013. TCE seemed to be on an upward trend, going from 4 ug/L in 1998 up to 110 ug/L in December 2009, but was back down to < 1 ug/L in June 2013. Surprisingly Vinyl Chloride, which has not been detected in this well over the past 15 years, was detected at 8.1 ug/L in June 2013, above the MCL.

In addition to the RCRA monitoring wells, the same seven residential wells Ex. 6 Personal Privacy (PP) and the irrigation well at the Ex. 6 Personal Privacy (PP) that have been sampled over the past six years were also sampled. As has been the results in the past, there were no detections of volatile organic compounds in any of these wells. The laboratory analytical report supporting this report is attached for review.

2. **Upcoming Events/Activities Planned** – The existing remediation systems will continue to operate as planned.
3. **Anticipated Problem Areas and Recommended Solutions** – None.
4. **Key Personnel Changes** – None.
5. **Target and Actual Completion Dates** – This project has not deviated from the project schedule.